

The Honorable Jeffrey Runge, M.D.  
Administrator  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

October 14, 2002

Regarding: NHTSA 2001 docket 8677 - specifically: NHTSA-2001-8677-470,  
NHTSA-2001-8677-471, NHTSA-2001-8677-513

Dear Dr. Runge:

The recent NHTSA TREAD Act EWR Forum on September 24, 2002 helped shed some light on many of the technical issues surrounding data applicability and reporting. However, there is still a significant lack of clarity surrounding some of the nuts-and-bolts of data reporting. Additionally, not all companies were able to attend the event. Finally, and most importantly, to date there has been almost no public discussion around the company-internal technology and business-process changes required to meet the EWR requirements of the TREAD Act. In many ways these issues are not (technically) of direct concern to NHTSA. However, given the scope, complexity, and fluid nature of the requirements, these issues need to be addressed early on to ensure ease of compliance by the industry.

The goal of most companies is to meet compliance in a robust fashion and do this in a cost effective way that also minimizes operational disruption. To address this goal and, at the same time, remedy several of the issues raised above, we would like to suggest that NHTSA create additional forums for information sharing and distribution. Such forums would do more than just address the legal and technical issues surrounding TREAD EWR compliance. They would also provide the opportunity for interested parties to discuss the related business and technical issues with their peers and other knowledgeable parties.

While several European OEMs have offices in NJ, most of those companies required to come into compliance with these portions of the TREAD Act are nowhere near Washington DC. They are primarily concentrated in the Mid-west and Southern California. These are two recommended places to hold these additional forums.

We feel that such forums are vital for both NHTSA and for vehicle and equipment manufacturers. Based on the interest expressed by several OEM's we have decided to create a forum to assist the industry with resolving issues related to EWR compliance. Our first such forum will take place on October 30<sup>th</sup> in Long Beach, California. In addition to representatives from numerous vehicle and equipment manufacturing companies, we will have technical, business-process, and legal experts in attendance.

It would be very beneficial to the industry participants if NHTSA and/or ODI and/or VOLPE representatives could also be present at this forum. We understand some of the sensitivities that may be involved for NHTSA (legal implications, etc) and are open to working with your office to address these issues. We will submit the notes from our forum to the DOT's docket management system. These notes, along with other TREAD Act related documents will also be accessible through our company web site ([www.syncata.com](http://www.syncata.com)).

In closing, we feel many companies who need to comply are not getting the information they need. With both the testing and reporting periods rapidly approaching, NHTSA needs to improve its lines of communication. Doing so will help companies meet compliance and ensure that the larger goal of improved vehicle safety comes to pass.

Sincerely,

Dr. James Intriligator  
TREAD Subject-Matter Expert  
Business Innovation Center  
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